**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**REGION 10**
**OREGON OPERATIONS OFFICE**
805 SW Broadway, Suite 500
Portland, Oregon 97205

February 11, 2015

Mr. Jim Orr
Oregon Department of Environmental Quality
Northwest Region Office
2020 SW 4th Avenue, Suite 400
Portland, Oregon 97201

Dear Mr. Orr:

The Environmental Protection Agency (EPA) has completed its review of the SW-8 Area Conveyor Grading Management and Stormwater Sand Filter BMP Pilot Study Work Plan for the Container Management facility. For your consideration and use, we have enclosed the technical review comments prepared by the EPA and its contractor CDM Smith.

The EPA's review has identified and recommended needs to provide additional background information for the previous investigative work completed at the site and additional information on the planned evaluations of the pilot study. The EPA and CDM Smith are available to meet with you at your convenience to discuss these review comments.

Please feel free to contact me at (503) 326-6554 or muza.richard@epa.gov regarding any questions that you might have on the EPA's review of the subject work plan for the Container Management facility.

Sincerely,

Rich Muza

Rich Muza
Remedial Project Manager

Enclosure

**Review Comments on the SW-8 Area Conveyor Grading Management and Stormwater Sand Filter BMP Pilot Study Work Plan Dated: January 9, 2015**

**General Comments**

1. The Work Plan should include a summary of collected samples, stormwater events, laboratory results, JSCS screening criteria, and a list of constituents of concern (COCs). Information such as sampled storm hydrology and precipitation amounts, when the sample was taken, and analytical results are critical to understanding the site, interpreting pollutant source assessments, and assessing the effectiveness of current and future best management practices (BMPs).
2. The work plan should present sampling procedures and requirements including sampling schedule, sampling method (i.e., grab or composite), and storm event criteria and selection as required in the 2010 "Guidance for Evaluating the Stormwater Pathway at Upland Sites, Appendix A: Instructions for Developing a Stormwater Assessment Workplan." Adhering to sampling guidance and target storm event criteria helps to ensure that stormwater runoff will be adequate for sample collection and will be representative of stormwater runoff. Stormwater samples collected from the sand filter must be representative for proper evaluation of treatment efficacy. Also see Specific Comment #14 below.

**Specific Comments**

1. Introductory Section, Page 1 -- The last paragraph of this introductory section refers to Figure 1 for the location of the former chain conveyor trench. Please revise Figure 1 to indicate where this trench is located.
2. Section 1.0, Page 1 -- The second sentence of this section refers to Figure 1 in reference to the Site's proximity to the Willamette River; however, Figure 1 does not show where the Willamette River is located. Please revise Figure 1 to indicate the proximity of the Site to the Willamette River.
3. Section 1.1, Page 2, First Paragraph -- The drainage basins associated with each stormwater catch basin should be clearly delineated in Figure 1. It is recommended that this omission be corrected.
4. Section 1.1, Page 2, First Paragraph -- A 42-inch diameter concrete storm sewer line is described in the text; however, it is not called out in Figure 1. Please revise Figure 1 to include the location or callout of the 42-inch sewer line.
5. Section 1.1, Page 2, Third Paragraph -- The first sentence refers to the site production building and front yard drum storage area; however, these areas are not labeled in Figure 1. Please revise Figure 1 to include callouts for relevant building names, industrial systems, and drainage catchment boundaries.
6. Section 1.1, Page 2, Bullet List -- SLR should show where the remaining four drainage basins (e.g., Front Yard Storage Drainage Basin, Soule Yard Drainage Basin, Warehouse Drainage Basin, and SW-8 Drainage Basin) are located either in Figure 1 or in a new figure. It is recommended that this omission be corrected.
7. Section 1.2, Page 4, Second Paragraph -- SLR should clarify when these stormwater-related improvements occurred. It is important to present this information so that water quality results can be reviewed in context with the site conditions existing at the time of sample collection. It is recommended that this omission be corrected.
8. Section 1.2, Page 4, Last Paragraph -- EPA has not had the opportunity to review the list of COCs for the site. Please provide a list of COCs in the Work Plan along with a summary of how the list of COCs was developed.
9. Section 1.2, Page 4, Last Paragraph -- EPA and other reviewers may not have had the opportunity to review the results of the site investigations described in the Work Plan. Please summarize these results, including any laboratory analysis, and provide them in the Work Plan.
10. Section 1.3, Page 4 -- Hydrologic information for each storm event, including precipitation measurements and when the samples were taken, should be documented in the Work Plan as this information provides context for the results of the analyzed samples. It is recommended that this omission be corrected.
11. Section 1.3, Page 5, First Paragraph -- SLR should provide a list of dates of the stormwater sampling events that have been conducted for the 1200-Z NPDES permit and include hydrological data as described in Specific Comment #9. It is recommended that this omission be corrected.

12. Section 1.3, Page 5 -- SLR should provide a table summarizing the analytical results so that the concentration reductions referred to in the text can be validated. The table should include the analytes, laboratory reporting limits, results, JSCS screening values, and any laboratory QC information. It is recommended that this omission be corrected.
13. Section 1.3, Page 5 -- No information on the stormwater sampling event for June 1, 2011 is presented in the description of sampling results. As stated in the previous comment, the Work Plan should include a summary of all stormwater sampling results collected to date. It is recommended that this omission be corrected.
14. Section 2.2, Page 6 -- Figures 1 and 2 should identify the location of the former chain conveyor and trench. It is recommended that this omission be corrected.
15. Section 3.0, Page 8, Last Paragraph -- The work plan should present sampling procedures and requirements, including sampling schedule, sampling method (i.e., grab or composite), and storm event criteria and selection. The 2010 "Guidance for Evaluating the Stormwater Pathway at Upland Sites, Appendix A: Instructions for Developing a Stormwater Assessment Workplan" requires the following:
    a. At least two of the four sampling events should represent "first flush" conditions. First flush is defined to mean within the first 30 minutes of stormwater discharge. All other samples should be collected within the first three hours of stormwater discharge;
    b. Describe the number of storms to be sampled and types of samples to be collected (e.g., first flush). Also include a target schedule for initiating and completing the rounds of stormwater sampling; and
    c. Schedule sampling events when it is predicted that the following storm event criteria will be met:
        i. Antecedent dry period of at least 24 hours (as defined by <0.1" over the previous 24 hours);
        ii. Minimum predicted rainfall volume of >0.2" per event; and
        iii. Expected duration of storm event of at least 3 hours.

    It is recommended that this section be updated to include the information required by the cited guidance.
16. Figure 2 -- There is a callout referring to Figure 4, which is not included in the Work Plan. It is recommended that this omission be corrected.
17. Figure A-1 -- SLR should include the slope planned for the sand filter construction. It is recommended that this omission be corrected.
18. Figure A-1 -- SLR should include a detail for the 2-inch diameter slotted PVC pipe. The detail should include information on the size of the slots as well as the minimum distance between slots. It is recommended that this omission be corrected.